

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

FILED 20 JAN 21 4 15 PM 2014

UNDER SEAL

UNITED STATES OF AMERICA

Case No. 3:14-cr-00028-J

v.

INDICTMENT

**MARK ANTHONY MILES, JR. (a/k/a
"Meezilini"),**

**18 U.S.C. §§ 1952(a)(3), 2421
18 U.S.C. §§ 2428, 981(a)(1)(C)
28 U.S.C. § 2461(c)**

Defendant

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Mann Act, 18 U.S.C. § 2421)

On or about May 7, 2013, in the District of Oregon and elsewhere, **MARK ANTHONY MILES, JR.**, defendant herein, did knowingly transport, and cause to be transported, Ivanice "Ivy" Harris, in interstate commerce from the State of Oregon to the State of Hawaii, while having the intent that Ivanice "Ivy" Harris engage in prostitution; all in violation of Title 18, United States Code, Section 2421.

COUNT 2

(Mann Act, 18 U.S.C. § 2421)

On or about May 1, 2012, in the District of Oregon and elsewhere, **MARK ANTHONY MILES, JR.**, defendant herein, did knowingly transport, and cause to be transported, Ivanice "Ivy" Harris in interstate commerce from the State of Oregon to the State of Hawaii, while having the intent that Ivanice "Ivy" Harris engage in prostitution; all in violation of Title 18, United States Code, Section 2421.

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COUNT 3
(Travel Act, 18 U.S.C. § 1952(a)(3))

In or about May 2013, in the District of Oregon and elsewhere, **MARK ANTHONY MILES, JR.**, defendant herein, traveled in interstate commerce to the State of Hawaii, with the intent to promote, manage, establish, carry on, and to facilitate the promotion, management, and carrying on of, an unlawful activity, specifically, a business enterprise involving prostitution offenses in violation of the laws of the State of Hawaii, and after traveling to Hawaii, did facilitate the promotion, management, and carrying on of said unlawful activity, and then traveled in interstate commerce from the State of Hawaii to the State of Oregon on or about June 2, 2013; all in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 4
(Travel Act, 18 U.S.C. § 1952(a)(3))

On or about May 12, 2012, in the District of Oregon and elsewhere, **MARK ANTHONY MILES, JR.**, defendant herein, traveled in interstate commerce, from the State of Oregon to the State of Hawaii, with the intent to promote, manage, establish, carry on, and to facilitate the promotion, management, and carrying on of, an unlawful activity, specifically, a business enterprise involving prostitution offenses in violation of the laws of the State of Hawaii, and after traveling from Oregon to Hawaii, did facilitate the promotion, management, and carrying on of said unlawful activity; all in violation of Title 18, United States Code, Section 1952(a)(3).

CRIMINAL FORFEITURE ALLEGATIONS

Upon conviction of one or more of the offenses set forth in Counts 1 and 2 herein, **MARK ANTHONY MILES, JR.**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 2428, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or

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derived from any proceeds obtained, directly or indirectly, as a result of such violations, including but not limited to: 2006 Mercedes Benz CL5 bearing Vehicle Identification Number (VIN) WDDDJ75X66A065358.

Upon conviction of one or more of the offenses set forth in Counts 3 and 4 herein, **MARK ANTHONY MILES, JR.**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said offenses, including but not limited to: 2006 Mercedes Benz CL5 bearing Vehicle Identification Number (VIN) WDDDJ75X66A065358.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

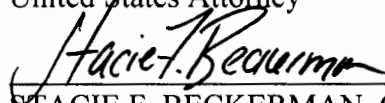
DATED this 23 day of January 2014.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL
United States Attorney


STACIE F. BECKERMAN, OSB #062397
Assistant United States Attorney

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